

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS

UNITED STATES OF AMERICA §
§
§
V. § CRIMINAL NO. 18-40
§
MARENE TOMPKINS

UNOPPOSED MOTION TO AMEND CONDITIONS OF RELEASE

MARENE TOMPKINS, through counsel George D. Murphy, Jr., moves to amend the conditions of her release to allow her to travel to Arizona on September 7 2018, and return to Houston, Texas on September 11, 2018. In support, Mrs. Tompkins present the following.

I.

On January 24, 2018, Marene Tompkins was indicted. The indictment alleges that she participated in a healthcare fraud scheme. On February 15, 2018, Mrs. Tompkins was released on a \$10,000 unsecured bond. One condition of her release is that her travel is restricted to the Southern District of Texas.

Mrs. Tompkins's mother died on Wednesday, August 29, 2018. She would like to attend her mother's memorial service which is on Monday, September 10, 2018. While in Arizona, Mrs. Tompkins will be staying with family. She will forward her complete itinerary to her pretrial services officer

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II.

Counsel has conferred with Mr. Andrew Flores, the Tompkins pretrial services officer, and Ms. Julie Redlinger, the Assistant United States Attorney handling this case. Both are unopposed to this motion.

Respectfully submitted,

/s/ George D. Murphy, Jr.
George D. Murphy, Jr.
Texas State Bar No. 14697990
1001 Fannin, Suite 2450
Houston, Texas 77002
(713) 658-1960

CERTIFICATE OF SERVICE

I hereby certify that on this 4th day of September, 2018, I e-filed the foregoing Unopposed Motion to Amend Conditions of Release.

/s/ George D. Murphy, Jr
George D. Murphy, Jr.

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ORDER

It is hereby ORDERED that Marene Tompkins may travel to Arizona on September 7, 2018, and she must return to Houston, Texas no later than September 11, 2018.

Signed this ____ day of September, 2018.

Honorable Sim Lake